

**LAW OFFICE OF  
HAROLD C. BAKER, ESQ.  
32 COURT STREET, SUITE 507  
BROOKLYN, NY 11201  
(718) 858-7927 Fax (718) 875-5883**

October 24, 2016

U.S. District Court Judge Anne Donnelly  
United States District court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Goodloe v. The City of New York, et. al., 1:12-cv-3018-AMD-VMS

Your Honor:

Pursuant to the Court's Order on October 14, 2016, Plaintiff is required to resubmit a proper 56.1 statement of material facts and a statement of additional material facts by October 24, 2016 and defendants are to submit their reply by October 31, 2016.

I have completed the revision to Plaintiff's 56.1 Statement and have drafted a Statement of Additional Material Facts which I intend to submit. It has come to my attention, however, that due to the massive changes I made in Plaintiff's 56.1 statement and the creation of Plaintiff's Statement of Additional Material Facts, the original citations contained in the Statement of Facts and Legal Analysis portions of Plaintiff's memorandum of law, now also need to be edited. despite my best effort, I do not anticipate being able to complete the revision of the memorandum of law by tonight's deadline.

I have discussed this with Ms. Haber, the attorney representing the defendants and with my client. Ms. Haber has informed me that she consents to a two day extension of time for me to complete the revision of Plaintiff's memorandum of law with the understanding that the time for the defendants to reply would also be extended.

In light of the foregoing, I respectfully request that the time for plaintiff to submit a revised 56.1 statement of material facts and a statement of additional facts and the

revised memorandum of law as required by the Court's October 13, 2016 Order be extended from October 24 to October 27, 2016, and that the defendants' reply date be extended to November 2, 2016.

This is Plaintiff's third request for an extension of time to reply to Defendants' motion for summary judgment.

Very truly yours,

*/S/*

Harold C. Baker

Cc: The City of New York  
Law Department  
100 Church Street  
New York, NY 10007  
Att.: Erica Haber, Senior Counsel